

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|------------------------------|---|------------------------|
| CHANNETTE CARPENTER, |) | |
| |) | |
| Plaintiff, |) | 07 C 6918 |
| |) | |
| v. |) | Judge Kendall |
| |) | |
| THE CITY OF CHICAGO, et. al. |) | Magistrate Judge Brown |
| |) | |
| Defendants. |) | |

**DEFENDANTS' JOINT MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant, the City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel, and Defendants Paul Lorenz, Matthew Shea, Dominick Doris, Rebecca Garcia, and Mahmoud Haleem., (collectively, “Defendant Officers”), by their attorney Marc J. Boxerman, respectfully requests this Honorable Court for an extension of time until March 14, 2008, to answer or otherwise plead to Plaintiff’s Complaint.

In support of this motion, Defendant City and Defendant Officers state:

1. Plaintiff’s thirty-two page, nineteen count, complaint was filed on December 7, 2007, in the United States District Court, Northern District of Illinois, Eastern Division. Assistant Corporation Counsel, Rita C. Moran, was assigned to this matter for Defendant City on January 29, 2008.
2. Counsel for the individual Defendant Officers was assigned and filed his appearance on January 29, 2008. Their attorney, Marc J. Boxerman, has not yet had an opportunity to meet with the five officers so that he may answer the complaint on their behalf.

3. Undersigned counsel Moran is in the process of ordering the relevant Chicago Police Department records to enable the City to properly respond to Plaintiff's Complaint.
4. This motion is the Defendants' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of this matter, nor will it prejudice Plaintiffs.
5. Counsel for Defendant City has made multiple attempts to contact Plaintiff's counsel to inform her of this motion and has not received a reply.

WHEREFORE, Defendants respectfully requests that they be given until March 14, 2008, to answer or otherwise plead to Plaintiffs' Complaint.

Respectfully Submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Rita C. Moran
RITA C. MORAN
Assistant Corporation Counsel
Attorney for Defendant City

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Suite 1020
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(312) 742-9866
Attorney No. 06270301

BY: /s/ Marc Boxerman
MARC BOXERMAN
Senior Counsel
Attorney for the Individual Defendants

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Attorney No. 6215790

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon the person(s) named in the Notice of Motion, who is a "Filing User" pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 4th day of February, 2008.

/s/ Rita Moran

RITA MORAN